

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

October 13, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write to call the Court's attention to a recently discovered open discovery issue concerning discovery from the International Islamic Relief Organization ("IIRO"). Newly disclosed evidence from an insider account of the history of al Qaeda, published in Arabic in 2021 after the U.S. Withdrawal from Afghanistan, evidences that IIRO's responses to plaintiffs' document requests are incomplete and/or inaccurate in material respects, and require supplementation.

We have written to counsel for IIRO to call the matter to counsel's attention and asked IIRO to supplement its responses in a timely manner, and in the interim, to meet and confer on the matter. Attached to this letter is a copy of that request.

At present, we are merely bringing the matter to the Court's attention, consistent with the Court's direction in ECF No. 7160, where the Court directed the parties to identify outstanding discovery issues regarding another defendant. We anticipate meeting and conferring with counsel for IIRO, and will advise the Court if we are unable to reach agreement regarding IIRO's supplementation.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. CarterBy: /s/ Robert T. Haeefe

The Sarah Netburn  
October 13, 2021  
Page 2

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Enclosure

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF